

1 JOINTLY SUBMITTED  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

11 ANDREW PERRONG and JAMES EVERETT  
12 SHELTON, individually and on behalf of all others  
similarly situated,

13 Plaintiff,

14 vs.  
15 TOMORROW ENERGY CORP fka SPERIAN  
16 ENERGY CORP, a Nevada corporation, and  
ENERGY GROUP CONSULTANTS, INC., a  
17 Kansas corporation, BAETYL GROUP LLC, a  
Texas limited liability company,

18 Defendants.

19 Related Cross-Claims and Third-Party Claims.

Case No. 2:19-cv-00115-RFB-EJY

**STIPULATION TO EXTEND THE  
DEADLINES TO SUBMIT AND  
RESPOND TO DISPOSITIVE  
MOTIONS ON PHASE I ISSUES BY 14  
DAYS; [PROPOSED] ORDER**

1        This stipulation is entered into by and between Tomorrow Energy Corp. fka Sperian Energy  
2 Corp. (“Tomorrow Energy” or “Sperian”), Andrew Perrong (“Mr. Perrong”), James Everett Shelton  
3 (“Mr. Shelton”) (together, with Mr. Perrong, “Plaintiffs”), Energy Group Consultants, Inc. (“EGC  
4 Inc.”), and Energy Group Consultants, LLC (“EGC LLC”), and made with reference to and in  
5 contemplation of the following facts and circumstances:

6        1.        On November 8, 2019, the aforementioned parties appeared before the Honorable  
7 Magistrate Judge Elayna J. Youschah for a status conference. Among other things, the Court ordered  
8 that discovery be bifurcated. (Dkt. No. 104.)

9        2.        On December 10, 2019, the parties appeared before the Honorable Magistrate Judge  
10 Elayna J. Youschah for a telephonic status conference. Among other things, the Court established a  
11 March 31, 2020 deadline by which to file dispositive motions on Phase I issues. (Dkt. No. 106.)

12        3.        Phase I discovery recently concluded. To allow additional time to review documents  
13 and information exchanged during Phase I discovery, the parties agree, subject to the Court’s  
14 approval, that the deadline by which to file dispositive motions on Phase I issues is extended by 14  
15 days, from March 31, 2020 to April 14, 2020.

16        4.        The parties also agree that the deadline by which to respond to the dispositive  
17 motions on Phase I issues is extended by 14 days, from April 21, 2020 to May 5, 2020.

18        5.        The parties also agree that the deadline by which to submit a reply in support of  
19 dispositive motions on Phase I issues is extended by 14 days, from May 5, 2020 to May 19, 2020.

20        IT IS SO STIPULATED between counsel for the parties that (i) the deadline by which to file  
21 dispositive motions on Phase I issues is extended by 14 days, from March 31, 2020 to April 14,  
22 2020, (ii) the deadline by which to respond to the dispositive motions on Phase I issues is extended  
23 by 14 days, from April 21, 2020 to May 5, 2020, and (iii) the deadline by which to submit a reply in  
24 support of dispositive motions on Phase I issues is extended by 14 days, from May 5, 2020 to May  
25 19, 2020.

1  
DATED: March 23, 2020

2 By: /s/ Harrison Brown

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24 DATED: March 23, 2020

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1  
2 DATED: March 23, 2020

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1                   **[PROPOSED] ORDER**

2       Upon the stipulation of the parties, and good cause appearing, IT IS HEREBY ORDERED  
3       that (i) the deadline by which to file dispositive motions on Phase I issues is extended by 14 days,  
4       from March 31, 2020 to April 14, 2020, (ii) the deadline by which to respond to the dispositive  
5       motions on Phase I issues is extended by 14 days, from April 21, 2020 to May 5, 2020, and (iii) the  
6       deadline by which to submit a reply in support of dispositive motions on Phase I issues is extended  
7       by 14 days, from May 5, 2020 to May 19, 2020.

8                   SO ORDERED.

9                   DATED: March 24, 2020

10                  By:

11                    
12                  Elayna J. Youschah  
13                  United States Magistrate Judge